



Director  
Food Distribution Division  
Food and Nutrition Service  
3101 Park Center Drive  
Alexandria, VA 22302

Dear Sir:

I am writing in regard to USDA's proposal for changing the commodity Food Distribution Program, and I will comment on each of the proposed sections.

Section I: Problems and concerns

- The form in which the commodities come has improved.
- The problems of uneven flow has improved.
- Our deliver of commodities is no longer unpredictable.

Section II: Improvements to the Commodity Program

- Expanding the use of long-term contracts would be positive.
- I am not sure about updating product specifications. Would we be getting better quality or lower quality? School Nutrition Directors need to be involved in this.
- Allowing vendors to use commercial labels could be a nightmare for people receiving shipments to schools along with other purchased items. This would also make it difficult to easily identify USDA commodity items in the store room.
- I would be in favor of national umbrella contracts with processors with states still being allowed to make contracts also.
- I am not in favor of "full substitutability" of commodity product by the processors. How can we be assured that we are getting the same quality???
- (I agree with all the items addressed under "commodity Holds and Recalls")
- Regarding "Communication/Pilots/Other Improvements", I am not in favor of providing computer connection to the school level. Our state commodity Distribution office does an excellent job for us, and our communication regarding USDA foods needs to come through them.
- Providing a single USDA point of contact would be good for the processors, but we want to still be able to call the people in Georgia's Commodity Distribution office.

- The time line does not allow adequate time for pilot-tests, and we surely do not need to make such drastic changes without adequate data.
- I agree with relaxing the truck load requirements.

In 1992 an official USDA study found that 71% of School Nutrition Directors said that their state agencies were "excellent to very good". Therefore, USDA needs to work with those states that are having problems, rather than drastically changing the program to accommodate a few.

And please do not go out and make drastic changes to our program without adequate input from those school nutrition directors who are, for the most part, pleased with the operation of the commodity program and grateful for the foods which it provides for our use.

Sincerely,

A handwritten signature in cursive script that reads "Susan A. McCranie".

Susan A. McCranie  
School Nutrition Director